

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND**

SABEIN BURGESS,)	
)	
Plaintiff,)	Case No. 1:15-cv-00834-RDB
)	
v.)	
)	
BALTIMORE POLICE DEPARTMENT, <i>et</i>)	Hon. Richard D. Bennett,
<i>al.</i> ,)	District Judge
)	
Defendants.)	

DECLARATION OF TONY BALKISSOON

I, Tony Balkissoon, depose and swear as follows:

1. I have been admitted to practice law since November 2010. I am a member of the following courts: New York, District of Columbia, Illinois, United States Court of Appeals for the Fourth Circuit, United States Court of Appeals for the Fifth Circuit, United States Court of Appeals for the Seventh Circuit, United States Court of Appeals for the Eighth Circuit, United States Court of Appeals for the Tenth Circuit, United States Court of Appeals for the Federal Circuit, United States District Court for the Central District of Illinois, United States District Court for the District of Maryland, United States District Court for the Northern District of Illinois.

2. I graduated *cum laude* from Harvard Law School in May 2010. At Harvard, I received awards for academic distinction, including Dean's Scholar prizes in Trademark Law and Sex Equality classes. I also volunteered with Harvard College's Office of Sexual Assault Prevention and Response.

3. Between years at Harvard, I worked as an intern at the Community Legal Clinic of York Region, in Richmond Hill, Ontario. I also worked as a summer associate at Sidley Austin LLP in Chicago, Illinois, focusing on intellectual property litigation.

4. After law school, I worked for several years as an associate at Sidley Austin LLP in Chicago, in the Intellectual Property Litigation group. In that role I took and defended depositions, wrote summary judgment and appeal briefs, managed and pursued discovery, and participated on trial teams, including conducting a direct examination at a bench trial. I was part of the trial team that secured a \$14 million verdict for our client, Microsoft, in a patent-related lawsuit against Motorola (owned at the time by Google). In related litigation between the two companies, I successfully argued a motion concerning the scope of our client's patent.

5. While at Sidley Austin, I did significant *pro bono* work, including in the areas of criminal defense and immigration. In one case, I wrote briefs that convinced the district judge to impose a lenient sentence on my client, due in part to the extraordinary trauma my client suffered as a child, which stunted his maturation. I also worked on litigation under Section 1983, on behalf of a client who was denied appropriate medical care while in prison.

6. My hourly rates at Sidley Austin were as follows:

Effective Date	Rate
5/26/2009 – 7/31/2009 (Summer Associate)	\$175
8/23/2010 – 10/31/2010	\$240
11/1/2010 – 12/31/2010	\$315
1/1/2011 – 12/31/2011	\$325
1/1/2012 – 12/31/2012	\$390
1/1/2013 – 12/31/2013	\$460
1/1/2014 – 6/19/2014	\$615

7. In the summer of 2014, I left Sidley Austin to become a law clerk to the Honorable Manish S. Shah in the United States District Court for the Northern District of Illinois.

8. In the summer of 2015, I became a law clerk on the United States Court of Appeals for the Seventh Circuit, to The Honorable Ann Claire Williams, serving for a term of one year.

9. After clerking for Judge Williams, I joined Loevy & Loevy to practice civil rights litigation. While at Loevy & Loevy, my practice consisted of primarily wrongful conviction cases. At Loevy & Loevy, as during my time at Sidley Austin, I handled aspects of pleadings, discovery, substantive motions, depositions, pre-trial litigation, and appellate briefing. I also argued an appeal in the United States Court of Appeals for the Fifth Circuit, and one for a *pro bono* client in the United States Court of Appeals for the Eighth Circuit.

10. I left Loevy & Loevy in March 2019 to join the Roderick and Solange MacArthur Justice Center's Supreme Court and Appellate Practice. There, I litigated criminal justice and civil rights cases in appellate courts around the country, including arguing an appeal in the United States Court of Appeals for the Tenth Circuit.

11. In January 2020, I left MacArthur to become Vice President and Executive Counsel at the John Jay College of Criminal Justice, part of the City University of New York.

12. In the Burgess litigation, I worked on all matters relating to pretrial discovery, including discovery requests, taking and defending depositions, motion practice and retaining and working with experts. In addition, at trial, I not only assisted with the preparation of witnesses and the strategy of the case, but also put on Gun Shot Residue expert John Kilty. Following the trial, I helped with the post-trial and appellate briefing.

13. I have reviewed the billing records for my time spent on this matter. Those records are a fair and accurate depiction of the time I spent working on this case and are reasonable in terms of the time spent on each task.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 10/28/2021

A handwritten signature in black ink, appearing to read 'Tony Balkissoon', written over a horizontal line.

Tony Balkissoon